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ORGANIC PROGRAM

2005 JUN -6 A 11: 03

PERRY D. ODAK
President & CEO

June 1, 2005

Mr. Arthur Neal
National Organic Standards Board
Room 4008 – South Building
1400 and Independence Avenue SW
Washington, DC 20250-0001

Dear Mr. Neal:

Wild Oats Markets, Inc. submits this written comment to the National Organic Standards Board ("NOSB") regarding the proposed guidance statement for NOP Pasture Requirements.

Our company is a nationwide chain of natural and organic foods markets in the U.S. and Canada. With more than \$1 billion in annual sales, the Company currently operates 111 natural food stores in 24 states and British Columbia, Canada. The Company's markets include: Wild Oats Natural Marketplace, Henry's Farmers Market, Sun Harvest and Capers Community Markets.

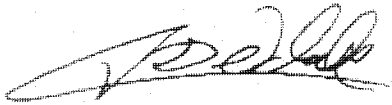
Each week hundreds of thousands of consumers shop in our stores, and organic dairy products are among the most frequently purchased items. Ensuring a growing and consistent supply of organic dairy products for our consumers is paramount for us to meet the growing demand for this popular category. Our consumers are dedicated organic purchasers and are very knowledgeable about organic standards. They express satisfaction and confidence in the USDA organic standards as they are currently being maintained.

We are concerned with two aspects of the proposed NOSB guidance statement. First, it appears that the prescriptive measures in the guidance, specifically the requirement for 30% dry matter intake from pasture for a minimum of 120 days, will be geographically biased in a manner that is unfavorable to organic dairies in the drier climates of the Western United States. We believe that the current organic rule, which focuses on developing good farm plans but does not impose these prescriptive measures, is the best way to implement organic standards in a manner that upholds these standards and promotes the growth of organic dairy in all climates and geographies of the country. Second, the proposed guidance asserts that the prescriptive measures will improve animal health. However, knowledgeable organic dairy nutritionists have reported that there is no compelling body of evidence supporting this assertion.

Mr. Arthur Neal
June 1, 2005
Page Two

We request that the proposed prescriptive measures in the guidance statement not be recommended to the National Organic Program. Both we and our customers believe that the current program is working well and does not need to be changed. In conclusion, the organic program should be run in a way that facilitates the expansion of organic milk supply in all U.S. geographies so that as many consumers as possible can enjoy organic dairy products.

Sincerely,

A handwritten signature in black ink, appearing to read "Perry D. Odak", with a stylized, cursive script.

Perry D. Odak